

GEORGE B. FREEHILL  
 WILLIAM L. JUSKA, JR.  
 JAMES L. ROSS\*  
 ERIC E. LENCK  
 JOHN J. WALSH\*  
 PATRICK J. BONNER\*  
 PETER J. GUTOWSKI  
 MARK F. MULLER  
 WAYNE D. MEEHAN\*  
 DON P. MURNANE, JR.\*  
 THOMAS M. RUSSO  
 THOMAS M. CANEVARI †  
 MICHAEL FERNANDEZ\*  
 JOHN F. KARPOUSIS\*  
 MICHAEL E. UNGER\*  
 WILLIAM J. PALLAS\*  
 GINA M. VENEZIA\*  
 LAWRENCE J. KAHN\*  
 BARBARA G. CARNEVALE\*  
 MANUEL A. MOLINA  
 JUSTIN T. NASTRO\*  
 PAMELA L. SCHULTZ\*  
 DANIEL J. FITZGERALD\*  
 MICHAEL C. ELLIOTT\*  
 JAN P. GISHOLT†

\*ALSO ADMITTED IN NEW JERSEY  
 †ALSO ADMITTED IN CONNECTICUT  
 ‡ALSO ADMITTED IN WASHINGTON, D.C.  
 \*ALSO ADMITTED IN LOUISIANA

LAW OFFICES OF  
**FREEHILL HOGAN & MAHAR LLP**  
 80 PINE STREET  
 NEW YORK, N.Y. 10005-1759  
 TELEPHONE (212) 425-1900  
 FACSIMILE (212) 425-1901  
 E-MAIL: [reception@freehill.com](mailto:reception@freehill.com)  
[www.freehill.com](http://www.freehill.com)

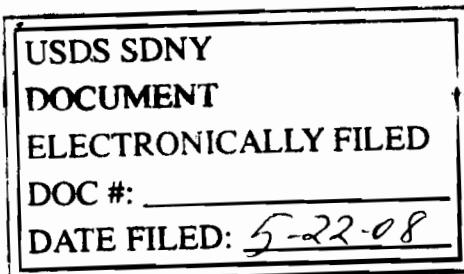
NEW JERSEY OFFICE  
 549 SUMMIT AVENUE  
 JERSEY CITY, N.J. 07306-2701  
 TELEPHONE: (973) 623-5514  
 FACSIMILE: (973) 623-3813

CONNECTICUT OFFICE  
 23 OLD KINGS HIGHWAY SOUTH  
 DARIEN, CT 06820-4538  
 TELEPHONE: (203) 921-1913  
 FACSIMILE: (203) 358-8377

MAY 22 2008

May 21, 2008

Our Ref: 20-08/ROSS



Honorable Victor Marrero  
 United States District Judge  
 Daniel Patrick Moynihan U.S. Courthouse  
 500 Pearl Street, Room 660  
 New York, NY 10007

RE: Matsuoka Reizo Co., Ltd. v. Sea Trade International, Inc.  
 and China Ocean Shipping Co.  
 07 CV 10297 (VM)

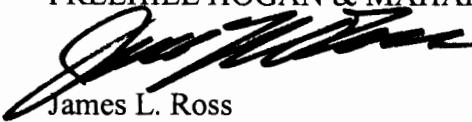
Dear Judge Marrero:

We are attorneys representing the Defendant CHINA OCEAN SHIPPING CO., LTD. in the captioned litigation pending before Your Honor. With the consent and agreement of all opposing counsel, we respectfully ask that the Court allow the parties an additional 90 days within which to complete all fact discovery. Enclosed is the existing Civil Case Management Plan and Scheduling Order which had set June 6, 2008 for completing fact discovery. This is the first request for an extension of the fact discovery deadline.

The subject litigation is a maritime claim for alleged damage of frozen seafood transported by sea from Tacoma, Washington to Tokyo, Japan. To date, the parties have made their initial disclosure and there has been document discovery. However, additional documentation and information is needed from Japan, where the alleged damaged shipment was delivered, as well as the load port at Tacoma.

Under the circumstances, we respectfully ask that the deadline for completing factual discovery be extended up to September 8, 2008. In addition, we jointly ask that the upcoming June 13, 2008 Pre-Trial Conference, which had been scheduled in conjunction with the completion of discovery, be adjourned until sometime in September following completion of discovery.

Respectfully submitted,  
FREEHILL HOGAN & MAHAR LLP



James L. Ross

ROSS:hr  
Enclosure

CC:  
McDermott & Radzik, LLP  
Wall Street Plaza  
88 Pine Street, 21<sup>st</sup> floor  
New York, New York 10005  
Attn: Edward C. Radzik, Esq.

Cichanowicz Callan Keane Vengrow & Textor  
61 Broadway  
Suite 3000  
New York, New York 10006  
Attention: Patrick M. DeCharles, II, Esq.

<p>Request GRANTED. The Case Management Plan for this action is amended so as to extend the time for completion of fact discovery to 9-19-08. Any other related deadline affected by this extension shall be similarly modified. The next SO ORDERED. status conference is rescheduled to 9-19-08 at 9:45 a.m.</p>	
DATE	 VICTOR MARRERO, U.S.D.J.